

P.O.Box 5173  
Bergenfield, NJ 07621

andre@traviesolaw.com  
O: 212-292-4557  
C: 917-435-3700  
F: 212-202-7631



ANDRÉ G. TRAVIESO  
Admitted New York & New Jersey

April 22, 2021

**VIA ELECTRONIC CASE FILING (ECF)**

Honorable Judge Paul Oetken  
United State District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

*Re: United States of America v. Akbar (1:20-CR-00563)*

Dear Judge Oetken:

I file this letter motion on behalf of my client, Javian Moore, respectfully requesting that the conditions of Mr. Moore's bail are modified so that he may be allowed to travel to Miami, Florida from May 14, 2021 through May 17, 2021. My client will be staying at the Mondrian Hotel at 1100 West Avenue, Miami Beach, FL 33139. Mr. Moore will be visiting family and this trip is only for personal time with his family.

The defense has spoken with Mr. Moore's pre-trial officer, Francesca Piperato, regarding this proposed trip and pre-trial does not have any objections to this travel request. The Government defers to the decision of pre-trial services as to my client's travel.

Hence, we hereby request that Mr. Moore's bail conditions be modified in accordance with this proposed travel request.

Thank you in advance for your immediate attention to this matter.

Respectfully,

/s/ André G. Travieso

André G. Travieso

AGT/

cc: AUSA Emily Johnson, AUSA Kaylan Kaylan, AUSA .

Granted.  
So ordered.  
4/26/2021

A handwritten signature in blue ink, appearing to read 'J. PAUL OETKEN'.

J. PAUL OETKEN  
United States District Judge